

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., *et al.*, \*

*Plaintiffs,* \*

v. \* No. 1:16-cv-03311-ELH

LAWRENCE HOGAN, *et al.* \*

*Defendants.* \*

\* \* \* \* \*

**DEFENDANTS' CONSENT MOTION FOR EXTENSION OF TIME**

Pursuant to Local Rule 105.9, the defendants, Lawrence Hogan and William M. Pallozzi, through counsel, move to extend the time for filing their opposition/reply in the summary judgment briefing and their response to the plaintiffs' motion to strike opinions of defendants' experts (ECF 79). Under the current scheduling orders, both filings are due today, November 9, 2018. (ECF 72, 83.) Due to a medical emergency, defendants seek, and plaintiffs consent to, a one-week extension to November 16, 2018.

In support of their motion, the defendants state the following:

(1) The defendants previously sought, and plaintiffs consented to, an extension of the filing deadline for their response to plaintiffs' motion to strike opinions of defendants' experts until Friday, November 9, 2018. (ECF 83.)

(2) That extension resulted in a filing deadline that was simultaneous with the deadline for defendants to file their opposition/reply in support of summary judgment pursuant to this Court's most-recent scheduling order (ECF 72).

(3) During the early morning hours of Friday, November 9, Jennifer L. Katz, one of defendants' co-counsel, was admitted to the hospital with an emergency medical condition.

(4) Robert A. Scott, the other co-counsel for defendants, is out of the office today, having travelled to Wisconsin for a previously scheduled family visit.

(5) Although the filings that are otherwise due today are close to complete, they still require the attention of counsel who is familiar with the case, both of whom are unavailable to finalize the materials and file them today.

(6) Extending the filing deadline by one week to November 16, 2018, will provide sufficient time for counsel for defendants to return to the office and finalize the materials for filing.

(7) The parties have agreed to a reciprocal one-week extension of the deadline for plaintiffs to file their summary judgment reply.

(8) Through counsel, all plaintiffs have consented to the relief requested in this motion.

A proposed order is attached.

Respectfully submitted,

BRIAN E. FROSH  
Attorney General of Maryland

Date: November 9, 2018

/s/ Robert A. Scott  
ROBERT A. SCOTT (FED. BAR #24613)  
JENNIFER L. KATZ (FED. BAR #28973)  
Assistant Attorneys General  
Office of the Attorney General  
200 St. Paul Place, 20th Floor

Baltimore, Maryland 21202  
(410) 576-7005; (410) 576-6955 (fax)  
jkatz@oag.state.md.us

Attorneys for Defendants

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of November, 2018, a copy of the foregoing motion was filed via ECF and thereby served on all counsel of record.

/s/ Robert A. Scott

Robert A. Scott